

Denise Jones
412-610-5635
msdenisejonesdcs@yahoo.com
May 27,2022

The Honorable Andrew L. Carter Jr.
United States District Court
Southern District of New York
500 Pearl street, New York, NY 10007

Re: 1:22 cv 00893(ALC)

The Plaintiff Denise Jones is respectfully asking the courts to deny Atlantic Records Corporation's request for a pre-motion trial. Denise Jones believes that the request for pre-trial is being presented for improper purposes such as to harass, cause a delay, needlessly inconveniencing the cost to the Federal Courts of the state of New York southern district. The claim against Atlantic Records is in fact supported by the existing U.S. Copyright Law section 106(A)(a)(3). The factual contentions have evidently support and will evidentiary support after a (reasonable opportunity) for further investigation or discovery.

First I would like to address paragraph A. Of Atlantic Records request for pre-motion hearing. Atlantic records corporation states that "the plaintiff has not pleaded a claim for copyright infringement". Denise Jones is concerned that the attorney may have rushed without reading the complaint.

On page 2 of the complaint it specifically states that the claim entered is for copyright infringement, harassment, and stalking. In paragraphs 1-7 it carefully explains the claim for copyright infringement.

The following paragraph Atlantic Records implies that "alleged service on them was improper". Denise Jones was granted IFP and solely depends on the courts and sheriffs to serve defendants. The sheriff's office was in direct communication with the plaintiff's and successfully executed the service. Carol Crawford from 1501 was not served yet who resides in TEXAS.

Denise Jones is asking the courts to grant an extension of time for service. The plaintiff did provide the information necessary to identify the defendants. The marshals failed to effect service for 1501 Carl Crawford.

A request for information on the artist was already submitted and denied without prejudice and will be re submitted when the case is further along. 1501 Carl Crawford is in an ongoing lawsuit with Meganestallion and her management company.

I would like to raise awareness to Atlantic Records' attempt to cause a delay by first telling the sheriffs office they don't accept complaints sending the sheriffs to CT CORPORATION. CT corporation signed the notice and accepted the complaint, then sent a hand typed letter to Denise Jones stating that they do not accept complaints for Atlantic Records. They did not

submit the letter via. Court system, they sent it directly to Denise Jones home in hopes to harass and cause delay.

The attorney from Atlantic Records stated that Denise Jones has not alleged direct evidence of copying. That's a false statement; the complaint clearly states that 14 direct bars(lyrics) were lifted from the collective works created by Denise Jones. The video and the lyrics were directly infringed against.

Page 2 paragraph 2 of Atlantic Records pre-motion request suggests that the plaintiff didn't prove access which is also a false narrative. The designated song writer Pardison Fontaine who is signed to Atlantic records, is the son of Mathview Jerry Thorpe who is Denise Jones former business partner. Mathview Jerry Thorpe and Denise Jones had an independent living company in 2018. The business ended in Denise Jones winning a court proceedings to end the company which provides access and motive. The plaintiff (attached) a previous PFA complaint and business registrations and contract between Mathview Jerry Thorpe and Denise Jones. The plaintiff also describes how Atlantic Records (repeat infringers) sent in teams of A&R such as Kevin Fox (Kevin Augurs), team Taylor Gang A&R who are also signed to Atlantic Records, digital X records who is signed to who's house entertainment. Who's house ENT. Is JOJO SIMIONS (Kevin Liles connection) and many more to stalk and harass Denise Jones.

The infringed work was widely disseminated on "all streaming platforms". Atlantic Records' misleading statement that the music is just now on Spotify is also incorrect. Denise Jones music was and is available on all streaming platforms through distrokid. BMI is just a performance license portal. Denise Jones music has been distributed through distrokid since 2019. Distrokid makes music available on all streaming platforms such as Spotify, Apple Music, iTunes, TikTok, Resso & Luna, YouTube Music, Amazon, Pandora, Deezer, Tidal, Napster, iHeartRadio, ClaroMusica, Saavn, Anghami, KKBox, MediaNet, Instagram/Facebook, Boomplay, NetEase, Qobuz, Tencent, Triller (beta), Soundtrack by Twitch, Yandex Music (beta) and many more since Jan 2020. (See attachment) for proof. There were multiple chains of events that demonstrated that the labels and creators had direct access to Denise Jones music and videos.

With all respects to the courts, Denise Jones is requesting that the pre-motion hearing request be denied and proceeded to court .

Denise Jones¹


5/31/2022